

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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HISCOX INSURANCE COMPANY, INC.

18-CV-10222-PAE

Plaintiff,

-against-

CURTIS BORDENAVE, BUSINESS MOVES
CONSULTING, INC. dba BUSINESS MOVES, KHALED
M. KHALED and ATK ENTERTAINMENT, INC.

Defendants.
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**NOTICE OF PLAINTIFF'S MOTION FOR
LEAVE TO FILE AN AMENDED COMPLAINT AND
FOR A SPEEDY HEARING**

PLEASE TAKE NOTICE THAT Plaintiff Hiscox Insurance Company, Inc. ("Plaintiff"), by and through its undersigned counsel, shall move this Court before the Honorable Paul A. Engelmayer, United States District Judge for the Southern District of New York, at Thurgood Marshall United States Courthouse, 40 Foley Square, New York, NY 10007, at such time as the Court may hereafter determine, for leave to file an Amended Complaint, pursuant to Rule 15(a)(2) of the Federal Rules of Civil Procedure.

Plaintiff further respectfully requests that, pursuant to Rule 57 of the Federal Rules of Civil Procedure this Court give expedited consideration to the motions currently pending in this case, due to the substantial prejudice accruing to Hiscox, and further set this matter down for a speedy hearing.

PLEASE TAKE FURTHER NOTICE THAT, in support of its motion, Plaintiff shall rely upon the accompanying Memorandum of Law and the Declaration of Laura B. Dowgin, Esq.

Pursuant to Local Civil Rule 6.1(b), any opposition to this motion shall be served within fourteen days after service of this Notice. Reply papers, if any, shall be served within seven days of service of the answering papers.

Dated: New York, New York
June 14, 2019

By: /s/ Laura Dowgin
Laura B. Dowgin, Esq. (LD8588)
Cozen O'Connor
Attorneys for Plaintiff
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CERTIFICATE OF SERVICE

I, Laura Dowgin, hereby certify that on this 14th day of June, 2019, I caused a copy of the foregoing
(i) Notice of Plaintiff's Motion for Leave to File an Amended Complaint and for a Speedy Hearing,
(ii) Memorandum of Law with Exhibits and (iii) Declaration of Laura B. Dowgin in Support
thereof, to be served through the Court's electronic filing system upon all counsel of record.

/s/ Laura Dowgin

Laura Dowgin